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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-549

13 **MA CORAZON SABADO DOMINE**
14 **13884 Euclid Strip, Apt. B-1**
15 **Garden Grove, CA 92843**

A C C U S A T I O N

Registered Nurse License No. 809480

Respondent.

16 Complainant alleges:

17 **PARTIES**

18 1. Louise R. Bailey, M.Ed., RN (Complainant), brings this Accusation solely in her
19 official capacity as the Executive Officer of the Board of Registered Nursing (Board),
20 Department of Consumer Affairs.

21 2. On or about November 16, 2011, the Board issued Registered Nurse License Number
22 809480 to Ma Corazon Sabado Domine (Respondent). The Registered Nurse License was in full
23 force and effect at all times relevant to the charges brought herein and will expire on October 31,
24 2013, unless renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board, under the authority of the following
27 laws. All section references are to the Business and Professions Code (Code) unless otherwise
28 indicated.

4. Code section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license.

STATUTORY PROVISIONS

6. Code section 2761 states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

...

"(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action."

COST RECOVERY

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

CAUSE FOR DISCIPLINE

(Unprofessional Conduct - Out of State Discipline)

(Bus. & Prof. 2761, subd. (a)(4))

8. Respondent is subject to disciplinary action under Code section 2761, subdivision

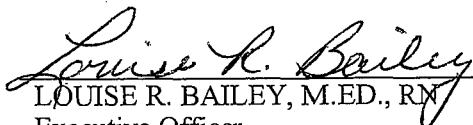
1 (a)(4), in that on or about May 7, 2012, in a disciplinary action before the Texas Board of
2 Nursing, in the matter of Texas License No. 683665, Respondent was reprimanded with
3 stipulations. The disciplinary action was based on Respondent's actions on or about December
4 30, 2009 when Respondent inserted a Dobhoff external feeding tube into a patient without having
5 the experience and skills to safely perform the procedure, and without obtaining assistance from
6 another nurse experienced and skilled in the procedure. Respondent's license was encumbered as
7 a result of her actions.

8 PRAYER

9 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
10 and that following the hearing, the Board of Registered Nursing issue a decision:

- 11 1. Revoking or suspending Registered Nurse License Number 809480, issued to Ma
12 Corazon Sabado Domine;
- 13 2. Ordering Ma Corazon Sabado Domine to pay the Board of Registered Nursing the
14 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
15 Professions Code section 125.3;
- 16 3. Taking such other and further action as deemed necessary and proper.
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20 DATED: JANUARY 17, 2013


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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